

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MOBILE DATA TECHNOLOGIES LLC,

Plaintiff,

 \mathbf{v}_i

**SAMSUNG ELECTRONICS AMERICA,
INC. AND SAMSUNG ELECTRONICS
CO., LTD.,**

Defendants.

Civil Action No. 2:24-cv-00435-JRG-RSP

**JOINT MOTION TO ENTER
PROTECTIVE ORDER**

The parties respectfully request that the Court enter the proposed Protective Order attached as Exhibit A.

Date: October 16, 2024

Respectfully submitted,

By: /s/ Michael C. Smith
Michael C. Smith
Texas Bar No. 18650410
SCHEEF & STONE LLP
113 East Austin Street
Marshall, Texas 75670
Telephone: (903) 938-8900
michael.smith@solidcounsel.com

BOCHNER PLLC
Erick S. Robinson, Lead Counsel
Texas Bar No. 24039142
24 Greenway Plaza
Suite 1800
Houston, TX 77046
Telephone: (713) 498-6047
erobinson@bochner.law

Attorneys for Plaintiff
Mobile Data Technologies LLC

/s/ Christine Potkay

Melissa R. Smith
TX Bar No. 24001351
melissa@gillamsmithlaw.com
GILLAM & SMITH, LLP
303 South Washington Ave.
Marshall, Texas 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257

Douglas J. Kline
Srikanth K. Reddy
Harrison Gunn
GOODWIN PROCTER LLP
100 Northern Avenue
Boston, MA 02210
Tel.: (617) 570-1000
Fax: (617) 523-1231
DKline@goodwinlaw.com
SReddy@goodwinlaw.com
HGunn@goodwinlaw.com

Darryl M. Woo
GOODWIN PROCTER LLP
Three Embarcadero Center
San Francisco, CA 94111
Tel.: (415) 733-6000
Fax: (415) 677-9041
DWoo@goodwinlaw.com

Patrick J. McCarthy
GOODWIN PROCTER LLP
1900 N Street, N.W.
Washington, D.C. 20036
Tel.: (202) 346-4000
Fax: (202) 346-4444
PMcCarthy@goodwinlaw.com

Naomi L. Birbach
Christine Potkay
GOODWIN PROCTER LLP
The New York Times Building
620 Eighth Avenue

New York, NY 10018
Tel.: (212) 813-8800
Fax: (212) 355-3333
NBirbach@goodwinlaw.com
CPotkay@goodwinlaw.com

*Attorneys for Defendants Samsung
Electronics Co. Ltd. and Samsung
Electronics America, Inc.*

CERTIFICATE OF CONFERENCE

I certify that I have conferred with opposing counsel on this motion, and that this is an agreed joint motion.

/s/ Michael C. Smith
Michael C. Smith

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was electronically filed with the Court using the CM/ECF system, which will send a notification of the filing via electronic mail to all counsel of record.

/s/ Michael C. Smith
Michael C. Smith